

May 22, 2019

Via SCPSC E-FILING DMS

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

**Re: Application of Duke Energy Carolinas, LLC for Approval of Rider 11,
Demand-Side Management and Energy Efficiency for 2020
Docket No. 2019-89-E: Comments**

Dear Ms. Boyd:

Walmart Inc. ("Walmart") timely filed a Petition to Intervene in this case on March 27, 2019, which was granted by Public Service Commission ("Commission") Directive Order issued on April 17, 2019. By way of this letter, Walmart provides limited Comments (due on this date per the Standing Hearing Officer Directive issued May 15, 2019).

Walmart has reviewed Duke Energy Carolinas, LLC's ("DEC" or "Company") filing and supporting documentation and has no objection to DEC's proposed changes. Walmart also notes that DEC proposes to maintain, without change, the opt-out provisions of Rider EE. Walmart strongly supports the opt-out concept in light of Walmart's extensive, self-funded energy efficiency ("EE")/demand-side management ("DSM") investments.


In recent years, however, Walmart has requested that DEC work with interested parties to modify its opt-out procedures (Rider EE(SC), pages 1 and 2) so that they are more consistent with its sister company, Duke Energy Progress ("DEP"), in South Carolina. The DEP tariff and procedures in this regard are more streamlined and efficient in Walmart's view (*see* DEP Rider DSM/EE-10, Sheet 1 of 2). Despite prior requests, DEC's DSM/EE opt-out provisions and procedures remain unchanged. Walmart affirms its willingness and desire to work cooperatively with DEC, the Office of Regulatory Staff ("ORS"), and other parties to evaluate harmonizing the DEC and DEP opt-out processes as soon as practicable. Walmart therefore respectfully requests that the Commission require DEC to engage with Walmart, ORS, and other interested parties in resolving this issue.

The Honorable Jocelyn G. Boyd
May 22, 2019
Page 2

By copy of this letter, I am serving all parties of record via Electronic Mail and/or First-Class Mail. Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

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SUE/sds
Attachments
c: Certificate of Service

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-89-E

In the Matter of:)	
)	
Application of Duke Energy Carolinas, LLC)	CERTIFICATE OF SERVICE
for Approval of Rider 11, Demand-Side)	
Management and Energy Efficiency for 2020)	

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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Dated: May 22, 2019